

## Section 1. Registration Information

### Source Identification

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Facility Name:	Atlas Roofing Corporation
Parent Company #1 Name:	Atlas Roofing Corporation
Parent Company #2 Name:	

### Submission and Acceptance

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Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	Phoenix Facility
Receipt Date:	30-Nov-2009
Postmark Date:	25-Nov-2009
Next Due Date:	25-Nov-2014
Completeness Check Date:	01-Dec-2009
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

### Facility Identification

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EPA Facility Identifier:	1000 0018 7843
Other EPA Systems Facility ID:	

### Dun and Bradstreet Numbers (DUNS)

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Facility DUNS:	
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

### Facility Location Address

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Street 1:	40 South 45th Avenue
Street 2:	
City:	Phoenix
State:	ARIZONA
ZIP:	85043
ZIP4:	
County:	MARICOPA

### Facility Latitude and Longitude

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Latitude (decimal):	33.447500
Longitude (decimal):	-112.156400
Lat/Long Method:	Interpolation - Digital map source (TIGER)
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	World Geodetic System of 1984
Source Map Scale Number:	

## Owner or Operator

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Operator Name:	Atlas Roofing Corporation
Operator Phone:	(602) 278-1300

## Mailing Address

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Operator Street 1:	40 South 45th Avenue
Operator Street 2:	
Operator City:	Phoenix
Operator State:	ARIZONA
Operator ZIP:	85043
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

## Name and title of person or position responsible for Part 68 (RMP) Implementation

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RMP Name of Person:	Jason Benefield
RMP Title of Person or Position:	Plant Superintendent
RMP E-mail Address:	jbenefie@atlasroofing.com

## Emergency Contact

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Emergency Contact Name:	Jason Benefield
Emergency Contact Title:	Plant Superintendent
Emergency Contact Phone:	(602) 278-1300
Emergency Contact 24-Hour Phone:	(480) 216-5618
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	jbenefie@atlasroofing.com

## Other Points of Contact

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Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	www.atlasroofing.com

## Local Emergency Planning Committee

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LEPC:	Maricopa County LEPC
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## Full Time Equivalent Employees

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Number of Full Time Employees (FTE) on Site:	25
FTE Claimed as CBI:	

## Covered By

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OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	Yes
Air Operating Permit ID:	030112

## OSHA Ranking

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OSHA Star or Merit Ranking:

## Last Safety Inspection

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Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External Agency:

Never had one

## Predictive Filing

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Did this RMP involve predictive filing?:

## Preparer Information

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Preparer Name:

Access Environmental Solutions, Inc.

Preparer Phone:

(662) 680-9927

Preparer Street 1:

102 S. Broadway St.

Preparer Street 2:

Preparer City:

Tupelo

Preparer State:

MISSISSIPPI

Preparer ZIP:

38894

Preparer ZIP4:

Preparer Foreign State:

Preparer Foreign Country:

Preparer Foreign ZIP:

## Confidential Business Information (CBI)

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CBI Claimed:

Substantiation Provided:

Unsanitized RMP Provided:

## Reportable Accidents

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Reportable Accidents:

See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

## Process Chemicals

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Process ID:

81591

Description:

Pentane Storage and Use

Process Chemical ID:

108519

Program Level:

Program Level 3 process

Chemical Name:

Pentane

CAS Number:

109-66-0

Quantity (lbs):

48450

CBI Claimed:

Flammable/Toxic:

Flammable

## Process NAICS

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Process ID:	81591
Process NAICS ID:	83574
Program Level:	Program Level 3 process
NAICS Code:	32615
NAICS Description:	Urethane and Other Foam Product (except Polystyrene) Manufacturing

## **Section 2. Toxics: Worst Case**

No records found.

## **Section 3. Toxics: Alternative Release**

No records found.

## Section 4. Flammables: Worst Case

Flammable Worst ID: 14034

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Model Used:

EPA's OCA Guidance Reference Tables or  
Equations

Endpoint used:

1 PSI

### Passive Mitigation Considered

Blast Walls:

Other Type:

Section 5. Flammables: Alternative Release

Flammable Alter ID: 10568

Model Used:	EPA's OCA Guidance Reference Tables or Equations
Passive Mitigation Considered	
Dikes:	
Fire Walls:	
Blast Walls:	
Enclosures:	Yes
Other Type:	
Active Mitigation Considered	
Sprinkler System:	
Deluge System:	
Water Curtain:	
Excess Flow Valve:	Yes
Other Type:	



## Section 6. Accident History

No records found.

## Section 7. Program Level 3

### Description

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Pentane Storage and Use

### Program Level 3 Prevention Program Chemicals

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Prevention Program Chemical ID:	69902
Chemical Name:	Pentane
Flammable/Toxic:	Flammable
CAS Number:	109-66-0

Prevention Program Level 3 ID:	47969
NAICS Code:	32615

### Safety Information

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Safety Review Date (The date on which the safety information was last reviewed or revised):	02-Apr-2009
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### Process Hazard Analysis (PHA)

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PHA Completion Date (Date of last PHA or PHA update):	29-May-2009
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### The Technique Used

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What If: Checklist: What If/Checklist: HAZOP: Failure Mode and Effects Analysis: Fault Tree Analysis: Other Technique Used: PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	Yes
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### Major Hazards Identified

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Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	
Equipment Failure:	
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	

Tornado:  
Hurricanes:  
Other Major Hazard Identified:

## Process Controls in Use

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Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

## Mitigation Systems in Use

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Sprinkler System:	
Dikes:	
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	

## Monitoring/Detection Systems in Use

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Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

## Changes Since Last PHA Update

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Reduction in Chemical Inventory:  
Increase in Chemical Inventory:  
Change Process Parameters:  
Installation of Process Controls:  
Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:  
Installation of Mitigation Systems:  
None Recommended: Yes  
None:  
Other Changes Since Last PHA or PHA Update:

## Review of Operating Procedures

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Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 01-May-2009

## Training

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Training Revision Date (The date of the most recent review or revision of training programs): 01-May-2009

## The Type of Training Provided

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Classroom: Yes  
On the Job: Yes  
Other Training:

## The Type of Competency Testing Used

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Written Tests: Yes  
Oral Tests:  
Demonstration: Yes  
Observation: Yes  
Other Type of Competency Testing Used:

## Maintenance

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Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 01-May-2009

Equipment Inspection Date (The date of the most recent equipment inspection or test): 05-Nov-2009

Equipment Tested (Equipment most recently inspected or tested): Process preventative maintenance

## Management of Change

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Change Management Date (The date of the most recent change that triggered management of change procedures): 11-Dec-2007

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 01-May-2009

## Pre-Startup Review

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Pre-Startup Review Date (The date of the most recent pre-startup review): 11-Dec-2007

## Compliance Audits

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Compliance Audit Date (The date of the most recent compliance audit): 01-May-2009

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 01-May-2009

## Incident Investigation

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Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

## Employee Participation Plans

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Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 01-May-2009

## Hot Work Permit Procedures

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Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 01-May-2009

## Contractor Safety Procedures

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Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 01-May-2009

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

## Confidential Business Information

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CBI Claimed:

## **Section 8. Program Level 2**

## Section 9. Emergency Response

### Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

### Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 19-Feb-2009

### Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 04-Jun-2009

### Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Phoenix Fire Department

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (602) 262-7589

### Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112: Yes

RCRA Regulations at CFR 264, 265, and 279.52: Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify):

## Executive Summary

Atlas Roofing Corporation  
Phoenix, Arizona  
Risk Management Program  
Executive Summary

### 1.0 Introduction

Atlas Roofing Corporation operates a foam insulation products facility in Phoenix, Arizona. Due to the quantity of a flammable hydrocarbon stored at the facility the facility is subject to the United States Environmental Protection Agency's Risk Management Program.

The purpose of the Risk Management Program is to prevent or reduce the severity of an accidental release of a hazardous chemical. Among the requirements of the Risk Management Program is the submission of a Risk Management Plan (RMP) summarizing the overall program. The following information is an Executive Summary of the information contained in the Risk Management Program. This Executive Summary includes a description of the company's accidental release prevention and safety policies, a facility and process description, and details of the facility's accidental release prevention program.

### 2.0 Accidental Release Prevention Policies

Atlas Roofing Corporation takes great care to ensure the safety of its employees and the surrounding community. Corporate and facility policies and safety programs are stressed in all aspects of facility operations.

Atlas Roofing Corporation's safety program provides rules and guidance for safe working methods in the operation, maintenance, and construction of the facility. The safety program includes the required personal protective equipment and safe work practices including lockout and tagout, hot work permitting, confined space entry, forklift operation, and flammable and toxic chemical handling. Employees are trained in the safe operation of the facility.

### 3.0 Facility and Process Description

The Atlas Roofing Corporation, Phoenix facility, manufactures foam insulation products for use in the housing industry.

The manufacture of foam insulation products proceeds as follows:

Raw materials are transported to the facility by rail car and truck. The chemicals are transferred from the rail cars or trucks to individual storage tanks except for some minor ingredients that are stored in drums or totes. The materials are transferred as needed to holding tanks and then to mixing tanks according to the foam formulation. From the mixing tanks, the foam is poured onto a conveyor line that moves the foam through each step of processing. The liquid foam is poured onto a facer material in evenly spaced intervals and the foam and facer travel to the laminator to be heated. In the laminator, the foam rapidly solidifies and expands to the predesignated thickness. Next, the foam moves down the line to be cut to premeasured lengths. Once the foam is cut to size, it is stacked, wrapped, and sent to the warehouse for shipping to customers.

### 4.0 Regulated Substances Present

One flammable hydrocarbon stored at the facility, pentane, is subject to the Risk Management Program regulations.

### 5.0 Accidental Release Prevention Program

The facility's accident prevention program includes each of the elements required by the Risk Management Program regulations.

#### 5.1 Process Safety Information

Atlas Roofing Corporation has gathered the necessary documentation of safety information on the covered process including the



maximum/minimum pressure, temperature, and inventory in covered tanks, the tank and piping materials of construction, documentation of design codes and standards used for the tanks and piping, and a description of safety systems in place. This information is periodically reviewed to ensure that the process is constructed according to good engineering practices.

## 5.2 Process Hazard Review

A Process Hazard Review has been conducted on the covered processes to determine the potential hazards of the process and to determine the possible equipment failures or human errors that could lead to a release. The results of the review were used to determine the appropriate safeguards needed to prevent failures or errors that could lead to a release.

## 5.3 Operating Procedures

Written operating procedures have been developed for operations. The purpose of the written operating procedures is to make sure that each employee before operating a process is knowledgeable of the correct operating methods, is aware of the chemical hazards present, and is qualified to respond correctly in an emergency situation.

## 5.4 Training

New employees are trained in the safe operation of plant processes and their performance is periodically evaluated. As needed, refresher training is provided. Employees are given safety training and are trained in the emergency response procedures discussed in Section 7.0.

## 5.5 Maintenance

Written maintenance procedures and training guide the safe work practices of maintenance employees and ensure that they are made aware of the potential hazards of the plant processes. A hot work permitting program, lockout tagout procedures, and confined space entry procedures have been put in place to protect maintenance workers while servicing equipment. Preventive maintenance inspections and testing are schedule based on manufacturers recommendations so that aging equipment can be replaced before failing and possibly causing an accidental release.

## 6.0 Five Year Accident History

No serious accidents have occurred at the facility in the last five years.

## 7.0 Emergency Response Coordination

A facility whose employees will not respond to accidental releases of regulated substances must coordinate response actions with the local emergency responders. The facility has satisfied this requirement.

## 8.0 Planned Future Safety Enhancements

Planned safety enhancements include the continued development of the facility's preventive maintenance program and ongoing safety training and new employee orientation. Together, these programs will continue to ensure the safety of employees and the community.